

**DOUGLAS A. DUCEY**  
- GOVERNOR -



**VICTORIA WHITMORE**  
- EXECUTIVE DIRECTOR -

**ARIZONA STATE VETERINARY MEDICAL EXAMINING BOARD**

1740 W. ADAMS STREET, STE. 4600, PHOENIX, ARIZONA 85007  
PHONE (602) 364-1-PET (1738) • FAX (602) 364-1039  
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**INVESTIGATIVE DIVISION REPORT**

**TO:** Arizona State Veterinary Medical Examining Board

**FROM:** Investigative Division

**RE:** Case: 21-131

Complainant(s): Arizona State Veterinary Medical Examining Board

Respondent(s): Katherine Heuerman – PALS Crematory (License: C0004)

**SUMMARY:**

Complaint Received at Board Office: 4/21/21

Committee Discussion: N/A

Board IIR: 5/19/21

**APPLICABLE STATUTES AND RULES:**

Laws as Amended August 2018

(Lime Green); Rules as Revised

September 2013 (Yellow)

On August 8, 2020, "Lola," a 16+-year-old female Chihuahua was euthanized by Dr. Collins from Pets at Rest. Mr. Hamby, the pet owner, elected to have the dog individually cremated with the ashes returned.

On August 10, 2020, Mr. Hamby decided he wanted to witness the cremation of his dog; a date and time was set up with the crematorium.

On September 3, 2020, when the pet owner went to view the cremation of his dog, a cat was in the viewing room. After some research, it was determined that Dr. Collins mislabeled the dog and the dog was communally cremated four days earlier on August 31, 2020.

On April 19, 2021, the Board reviewed complaint that was filed against Dr. Collins and voted to open an investigation with respect to the crematory's process.

**PROPOSED 'FINDINGS of FACT':**

1. On August 8, 2020, Dr. Collins performed an in-home euthanasia on the dog. The pet owner, Mr. Hamby, requested and paid for an individual cremation with ashes returned.
2. On August 10, 2020, Mr. Hamby decided he wanted to witness the cremation of his dog and contacted the crematorium - PALS. That day the PALS crematory driver picked up two remains from Dr. Collins – the dog in question (Lola) and a cat (Benji). The driver was alerted by the crematory, that Mr. Hamby wanted to witness the cremation of the dog; therefore, when the driver arrived back to the crematory, the pet remains were placed in a special hold area since it was not known when the cremation would take place.
3. According to Daniel Heuerman, the hold area is a special cold storage in the front office separate from the normal cold storage holding area. The remains were placed in the special hold cold storage with the original documentation that was placed on the pet by Dr. Collins and Pets at Rest. The documentation was not removed by PALS at any point.
4. On August 28, 2020, PALS received a call from the pet owner advising they would like to witness the dog's cremation on September 3, 2020. Entries were made into the system on the pet's record.
5. On September 3, 2020, Mr. Hamby arrived at PALS to view the dog and witness the cremation. It was at this point that it was discovered the pet had been mislabeled by Dr. Collins and Pets at Rest.
6. In a response dated October 3, 2020, Dr. Collins took responsibility for the mislabeling of the dog and implemented changes to the process to ensure this type of error would not occur again.
7. In a supplemental letter from Dr. Collins dated March 25, 2021, Dr. Collins stated that she had continual issues with the zip ties breaking that were supplied by PALS to attach to pets' remains. This led her to believe that there were multiple opportunities for the zip ties to break and reattached incorrectly after the pet left her care.

*The information contained in this report was obtained from the case file, which includes the complaint, the respondent's response, any consulting veterinarian or witness input, and any other sources used to gather information for the investigation.*

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Tracy A. Riendeau, CVT  
Investigative Division

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# SHERMAN & HOWARD L.L.C.

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7033 East Greenway Parkway, Suite 250, Scottsdale, Arizona 85254-2080  
Telephone: 480.624.2710 Fax: 480.624.2029 www.shermanhoward.com

Andrew Plattner  
Sherman & Howard L.L.C.  
Direct Dial Number: 480.624.2727  
E-mail: [aplattner@shermanhoward.com](mailto:aplattner@shermanhoward.com)

May 14, 2021

**Via Regular Mail and Via Email**

Arizona State Veterinary Medical Examining Board  
c/o Tracy A. Riendeau  
1740 W. Adams, Suite 4600  
Phoenix, AZ 85007  
(Email: [tracy.riendeau@vetboard.az.gov](mailto:tracy.riendeau@vetboard.az.gov))

***RE: 21-131, In Re: PALS – Pet Animal Lovers Service, Inc.***

Dear Ms. Riendeau and Board Members:

As you know, this firm has been retained to represent PALS in the above-referenced matter. We sincerely appreciate the extensions have granted.

We hope this narrative response, along with the Board's consideration of the true facts of this matter, cause it to immediately and fully dismiss this matter.

The question in front of this Board is: Who is the responsibility party to ensuring the deceased, when placed in a body bag, is properly labeled? The answer is: the veterinarian/veterinarian practice. PALS is not responsible for ensuring that the property tag is placed on the correct deceased pet. In this matter, the failure is entirely that of Dr. Collins and her practice. The process at PALS, which Dr. Collins' know, is that PALS retrieves the pets in their body bags ONLY if and after the practice affixes the zip ties/tabs to each such bag. If the practice mislabels or mixes up the labels, which is what occurred in this matter, PALS cannot be held responsible therefor.

The facts here are as follows:

- On August 8, 2020 Dr. Collin's (a licensed veterinarian with the Board) Practice entered Benji Isom and Lola Hamby into PALS' vet link system for PALS pick up on August 10, 2020. Someone in her practice attached the pets' personal identification sheet to the body bags with the zip ties and sleeves they are provided.

- On August 10, 2020 PALS caused Matt Nilsen to pick up both pets from Pets at Rest. They were already in the zip-tied holding bags with the identification on each prospective pet attached. Mr. Heuerman previously submitted to the Board examples of what the zip tied sheets and sleeves look like.

- On August 10, 2020 and before Matt Nilsen returned from his route, Brooke from PALS received a call (8-10-2020) from the pet parents that they wanted to do a witness service for Lola Hamby. Brooke told Matt to place the pet into the special hold area once Matt returned from his route, as the pet parents were not sure when they could schedule the witness service for Lola's cremation.

- The "Hold" area is a special cold storage unit in the front office building that is separate from the normal cold storage holding areas. PALS uses this for holding pets for special services such as "Witness Cremations." Pets are held in the sealed bags with their attached ID tags as PALS receive them from the practices.

- Matt placed the pet into the special HOLD cold storage area when he returned to the office that same day. The original documentation placed on the pet by the practice was with the pet when this was done and was never removed by PALS.

- On August 28, 2020, Brooke received another call from the pet parents saying they would like to schedule the witness service for 9-3-2020 at approximately 10 am that day.

- Brooke entered the information into the SRS computer program at that time. This would be the second line of the notes you, Tracy, referenced. The first line of notes stating: "...beginning "Cedar Urn" was entered by the Veterinary practice before we picked the pet up."

This is documented and verifiable in PALS SRS computer tracking system.

- It was not until the day of the witness service when PALS took the subject pet out of the Hold area (still, of course, enclosed in the body bag with the original documents) that PALS realized Dr. Collins' veterinary practice had made an error.

See Exhibit "A" hereto, which is a declaration signed by Taylor Brown (the Operations Manager) from PALS where Dr. Collins stated to Ms. Brown that the mislabeling of the pets was her fault.

See Exhibit "B" hereto, which is a declaration signed by Matt Nielson and Daniel Heuerman explaining PALS processes about accepting and not accepting pets from the applicable veterinary practice, and that it is always the practice's obligation to ensure proper labeling.

Further, we understand that Dr. Collins previously admitted in prior testimony to the Board that she/her practice was at fault here and then later, after advice from counsel, changed her story. According to the Investigative Committee Report, it appears the Committee determined that Dr. Collins' practice mislabeled the pets.

Based upon the foregoing, we respectfully ask the Board to dismiss this matter and cancel the Informal Interview that has been rescheduled to June 16, 2021. We see no culpability here upon PALS and, as such, such Interview would not be warranted.

Should the Board desire to discuss with PALS its processes, PALS is certainly willing to do so. However, such discussion is not properly made at an informal interview where PALS has no culpability for the underlying claim. Regardless, if the Board so desires, PALS will attend the informal interview.

Thank you very much.

Very truly yours,

*Andrew L. Plattner*

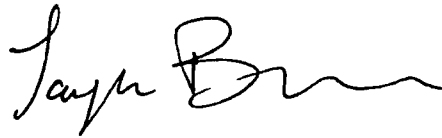
Andrew L. Plattner

ALP/CS

# EXHIBIT A

I spoke with Dr. Collins regarding Lola Hamby. I had called Dr. Collins to tell her that the pet parents claimed the pet we had picked up from Dr. Collins house labeled as Lola Hamby was in fact not their pet. Dr. Collins proceeded to tell me that she mislabeled two pets the day of Lola Hambys Euthanasia. Dr. Collins also told me that it was ultimately the pet parents fault that the two pets were mislabeled. She said that if they weren't "so crazy" and wouldn't have followed Dr. Collins out to her vehicle once the euthanasia was done, then none of the mislabeling would've happened. Dr. Collins apologized numerous times for putting myself (Taylor Brown-Operations Manager) and Joe (Cremationist) in such a messy situation. Dr. Collins did repeatedly say "This is my mistake, I'm so sorry".

Taylor Brown

A handwritten signature in black ink, appearing to read "Taylor Brown". The signature is stylized with a large, looped "T" and a cursive "B".

To whom it may concern:

I verified with the PALS Field Representative for Dr. Collins that when they retrieved the pets from her place, they were already in sealed bags with the identifying labeling attached.

Our procedure is to never accept or take pets if they are not already identified by the practice.

We cannot verify if Dr. Collins placed the animals in a bag herself or if it was anyone else who possibly works with her.

Also, three years ago we implemented SRS software to track and identify pets. All information for pets is inputted into this online, cloud-based database by the practice to their specific account. This is done to ensure that all pet information and service requests are documented by the referring practice before we receive a pet.

Field Representative Name: Matt Nielsen

Field Representative Signature: 

Signature: 

Name: Daniel Hewerman